

LAW OFFICES OF ROBERT P. SPRETNAK
Robert P. Spretnak, Esq. (Bar No. 5135)
8275 S. Eastern Avenue, Suite 200
Las Vegas, Nevada 89123
Telephone: 702-454-4900
Fax: 702-938-1055
Email: bob @ spretnak.com
Attorney for Plaintiff

OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.
Anthony L. Martin, Esq. (Bar No. 8177)
Noel M. Hernandez, Esq. (Bar No. 13893)
10801 W. Charleston Boulevard, Suite 500
Las Vegas, Nevada 89135
Telephone: 702-369-6800
Fax: 702-369-6888
Email: anthony.martin@ogletree.com, noel.hernandez@ogletreedeakins.com
Attorneys for Defendant

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

NICOLLE FOSTER,

Plaintiff,

vs.

CREDIT ONE BANK, N.A.; and CREDIT
ONE FINANCIAL, a Nevada corporation,

Defendants.

Case No.: 2:21-cv-00680-APG-VCF

**STIPULATION AND ORDER TO
EXTEND DEADLINES FOR FILING
DISPOSITIVE MOTIONS**

(Second Request)

Plaintiff NICOLLE FOSTER and Defendant CREDIT ONE BANK, N.A.,¹ by and through their respective counsel of record, STIPULATE AND AGREE that the current deadlines for briefing of a dispositive motions be extended briefing. This is the second request to extend the deadlines for the briefing of dispositive motions in this matter. Pursuant to the “Stipulation and Order Extending Dispositive Motions and Responses Thereto,” ECF No. 40, the briefing schedule for dispositive motions currently is as follows:

1. Dispositive motion must be filed no later than November 30, 2022;

¹ Defendant Credit One Financial, a Nevada corporation, was dismissed from this case by stipulation of the parties. See ECF No. 25.

1 2. Any opposition to a dispositive motion must be filed no later than December 14,
2 2022; and

3 3. Any reply in support of a dispositive motion must be filed no later than December 21,
4 2022.

5 The parties hereby stipulate and agree to modify this schedule as follows:

6 1. Dispositive motion must be filed no later than **December 9, 2022**;

7 2. Any opposition to a dispositive motion must be filed no later than **January 6, 2023**;

8 3. Any reply in support of a dispositive motion must be filed no later than **January 20,**
9 **2023**; and

10 4. In the event that no dispositive motion is filed on or before December 9, 2022, the
11 joint pretrial order shall be due 30 days after that date, on **January 9, 2023**. If a dispositive motion
12 is filed on or before December 9, 2022, the date for filing the joint pretrial order shall be suspended
13 until 30 days after decision on the dispositive motions or until further order of the court

14 There is good cause for this modification of the briefing schedule.

15 1. There is a significant volume of material to review in the preparation of the
16 dispositive motion and, afterwards, the opposition.

17 2. Plaintiff's counsel is scheduled to be out of the country on a scheduled vacation for
18 a two-week time period, from November 28, 2022, through December 9, 2022.

19 3. The revisions to the briefing schedule avoid deadlines falling close to holidays during
20 the year-end holiday season.

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This stipulation is not entered into for purposes of delay.

DATED: 16 November 2022.

DATED: 16 November 2022.

LAW OFFICES OF ROBERT P. SPRETNAK

OGLETREE, DEAKINS, NASH, SMOAK &
STEWART, P.C.

By: /s/ Robert P. Spretnak
Robert P. Spretnak, Esq.

By: /s/ Anthony L. Martin
Anthony L. Martin, Esq.
Noel M. Hernandez, Esq.

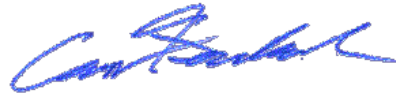
Attorney for Plaintiff

Attorneys for Defendant

8275 S. Eastern Avenue, Suite 200
Las Vegas, Nevada 89123

Wells Fargo Tower
3800 Howard Hughes Parkway, Suite 1500
Las Vegas, Nevada 89169

IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE

DATED: 11-16-2022